

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

No. 3:17-cv-06748-WHO

vs.

TESLA, INC. Dba TESLA MOTORS,
INC.; CITISTAFF SOLUTIONS,
INC.; WEST VALLEY STAFFING
GROUP; CHARTWELL STAFFING
SERVICES, INC.; NEXTSOURCE,
INC.; and DOES 1-50,
inclusive,

Defendants.

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DEPOSITION OF ANNALISA HEISEN

May 29, 2019

Reported by:

Bridget M. Mattos, CSR No. 11410

May 29, 2019

1 A P P E A R A N C E S

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ANNALISA HEISEN

May 29, 2019

1 A P P E A R A N C E S (continued)

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3 FOR THE DEFENDANT TESLA INC. Dba TESLA MOTORS INC.:

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1 EXAMINATION BY MS. JENG

2 MS. JENG: Q. So you previously testified
3 that the expectation for antidiscrimination and
4 harassment standards apply to both contractor and
5 general employees of Tesla; correct?

6 A. Correct.

7 Q. When you previously testified that you did
8 not know whether the employee policies against
9 discrimination and harassment, quote, "applied
10 equally," unquote, to contract workers and employees,
11 what did you mean by that?

12 A. The standards that are outlined for
13 expectations of employee behavior and conduct do apply
14 equally. But there's also verbiage in this policy
15 regarding disciplinary action, up to and including
16 termination, and that would be different for
17 contractors. If it's an agency, we don't have that
18 relationship with other staff. The agency does.

19 Q. One final question: Are production
20 associates required to do Manufacturing Essentials
21 training?

22 A. That's my understanding.

23 Q. And does that apply for contract workers as
24 well?

25 A. That's my understanding.

1 MS. JENG: Thank you.

2 MR ORGAN: Anybody else?

3 MR. HORTON: No questions.

4 MR. ARANEDA: No questions.

5 MR ORGAN: Okay. I just have a follow-up on
6 one of your answers to Patricia.

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8 FURTHER EXAMINATION BY MR. ORGAN

9 MR. ORGAN: Q. Relative to disciplinary
10 action, if Tesla finds or gets information that an
11 employee has engaged in harassing conduct, Tesla will
12 act on that, correct, even if it's a contractor doing
13 the harassing conduct?

14 **A. Tesla would partner with the agency and**
15 **collaborate with them to come up with an action.**

16 Q. And you would agree that Tesla, with respect
17 to any contract employee, can ask the contracting
18 agency not to send that individual to the Tesla
19 factory; right?

20 **A. They can say that that person is no longer**
21 **allowed on the property, or request that the contract**
22 **with Tesla end.**

23 Q. And certainly, if Tesla found or had
24 information that someone, a contractor, had engaged in
25 harassing conduct, Tesla would want to protect its

ANNALISA HEISEN

May 29, 2019

1 State of California)

2 County of Marin)

3

4 I, Bridget M. Mattos, hereby certify
5 that the witness in the foregoing deposition was by me
6 duly sworn to testify to the truth, the whole truth
7 and nothing but the truth in the within entitled
8 cause; that said deposition was taken at the time and
9 place herein named; that the deposition is a true
10 record of the witness's testimony as reported to the
11 best of my ability by me, a duly certified shorthand
12 reporter and disinterested person, and was thereafter
13 transcribed under my direction into typewriting by
14 computer; that the witness was given an opportunity to
15 read, correct and sign the deposition.

16 I further certify that I am not
17 interested in the outcome of said action nor connected
18 with or related to any of the parties in said action
19 nor to their respective counsel.

20 IN WITNESS WHEREOF, I have hereunder
21 subscribed my hand on May 29, 2019.

22

23 BRIDGET M. MATTOS, CSR NO. 11410

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